

Judge Richard A. Jones

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff

v.

SCHUYLER PYATTE BARBEAU,

Defendant.

NO. CR15-391RAJ

GOVERNMENT'S RESPONSE TO  
MOTION TO CONTINUE TRIAL

Noted: January 7, 2016

The United States of America, by and through Annette L. Hayes, United States Attorney for the Western District of Washington, and Thomas M. Woods, Assistant United States Attorney for said District, respectfully submits this response to Barbeau's motion to continue the trial.

The government does not oppose Barbeau's request for a continuance. As set forth in the motion, there are compelling grounds why Barbeau would not be ready by the current trial date, including, most notably, the potential change in counsel and his access to the discovery materials. With that said, the government believes a shorter continuance until May 2, 2016, is appropriate. The issues presented in this case are not complicated—Barbeau had in his possession a short-barreled rifle that also operated as a machine gun. Barbeau admitted to possessing the firearm, he was captured on recordings talking about

1 his possession of the firearm, and there are pictures of him holding the firearm. In sum,  
2 the defense should be able to be ready to try the case by May 2, 2016.

3 DATED: January 7, 2016

4 Respectfully submitted,

5 ANNETTE L. HAYES

6 United States Attorney

7  
8 /s/ Thomas M. Woods

9 THOMAS M. WOODS

10 Assistant United States Attorney

11 United States Attorney's Office

12 700 Stewart Street, Suite 5220

13 Seattle, Washington 98101-1271

14 Telephone: (206) 553-7970

15 Fax: (206) 553-0755

16 E-mail: thomas.woods2@usdoj.gov  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that he is an employee in the Office of the United States Attorney for the Western District of Washington and is a person of such age and discretion as to be competent to serve papers;

It is further certified that on January 7, 2016, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the CM/ECF participants.

/s/ Thomas M. Woods

THOMAS M. WOODS

Assistant United States Attorney

United States Attorney's Office

700 Stewart Street, Suite 5220

Seattle, Washington 98101-1271

Phone: (206) 553-7970

Fax: (206) 553-0755

E-mail: thomas.woods2@usdoj.gov